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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 MICHAEL RICHARD LYNCH AND  
17 STEPHEN KEITH CHAMBERLAIN,

18 Defendants.

CASE NO. 3:18-cr-00577-CRB

**NOTICE TO PARTIES RE: JUROR  
QUESTIONNAIRE**

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20 Having considered the parties' proposals, the Court adopts the attached juror  
21 questionnaire. The jurors will fill out the questionnaire on \_\_\_\_\_, 2024, in  
22 advance of jury selection on March 13, 2024.

23  
24 Dated: Jan. 7, 2024

25 \_\_\_\_\_  
26 CHARLES R. BREYER  
27 United States District Judge  
28

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND  
STEPHEN KEITH CHAMBERLAIN,

Defendants.

CASE NO. 3:18-cr-00577-CRB

**JUROR QUESTIONNAIRE**

You have been summoned by this Court for jury selection for a criminal case entitled United States v. Michael Richard Lynch and Stephen Keith Chamberlain. From 2009 to 2011, defendant Michael Richard Lynch was the Chief Executive Officer, and Stephen Keith Chamberlain was the Vice President of Finance of Autonomy, a software company with offices in the United Kingdom and San Francisco, California. Dr. Lynch and Mr. Chamberlain are charged with conspiracy to commit wire fraud and wire fraud, and Dr. Lynch is charged with securities fraud. The charges involve Autonomy's accounting and financial disclosures during the years 2009 to 2011 and the acquisition of Autonomy by Hewlett-Packard ("H-P") in October 2011. The charges are only allegations and not evidence. The defendants are presumed to be innocent of the allegations and have pleaded not guilty. The government has the burden to prove the allegations beyond a reasonable doubt.

As part of the jury selection process, each of you must complete this juror questionnaire. The questions on this form are asked to assist the Court and the attorneys in the jury selection process for this trial. This questionnaire is designed to obtain information about your background as it relates to your possible service as a fair and impartial juror in this case. Its use will avoid the necessity of asking each prospective juror every one of these questions in open Court.

Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues that must be decided in this case. The questions are not meant to invade your privacy but to help select a fair and impartial jury for this case.

If there is any reason why you might not be able to give both sides a fair trial in this case, it is important to say so. Please answer each question as fully as you can. Your complete honesty is essential. Do not leave any questions blank. If a question does not apply to you in any way, write “N/A” (for “not applicable”), rather than leaving the form blank. If you do not understand the question, please write that in the space for the answer. If you feel the answer is too personal, please say so in the space provided. You will have the opportunity to discuss your answer privately. If you do not understand a question, need more space for your response, or wish to make further comments about any question, please use the extra sheets attached at the end of the questionnaire. If you use the explanation sheets, please make sure to indicate which numbered question you are answering. DO NOT WRITE ON THE BACK OF ANY PAGE.

**You are instructed not to discuss this case or questionnaire with anyone, including your family or fellow jurors. It is also important that you do not engage in any research such as searching for stories or reports on the internet.** Your answers are confidential. They will be reviewed by the judge and the lawyers in this case.

Following jury selection, the original questionnaire will be kept under seal and will be disclosed, if at all, with names and other identifying information removed.

Upon completion, please sign your name on the last page where indicated. If possible print your answers and use ink only. You are expected to sign your questionnaire, and your answers will be given the same effect as a statement given to the Court under oath.

1. NAME: \_\_\_\_\_ Dr. Mr. Mrs. Ms. Miss Age: \_\_\_\_\_
2. Residence: County: \_\_\_\_\_ City/Town: \_\_\_\_\_ Neighborhood: \_\_\_\_\_  
[Do not list your street address]  
How long have you lived at that location? \_\_\_\_\_  
Your place of birth: \_\_\_\_\_  
Do you own or rent your home? Rent \_\_\_\_ Own \_\_\_\_ Other \_\_\_\_  
What other communities have you lived in during the last ten years? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
3. What is your marital status: (please circle)  
Single Married Separated Divorced Widowed Live with a partner
4. Do you have difficulty communicating in English, or understanding English?  
Yes \_\_\_\_ No \_\_\_\_
5. What is your current job status?  
\_\_\_\_\_ Working full-time \_\_\_\_\_ Unemployed and looking for work  
\_\_\_\_\_ Working part-time \_\_\_\_\_ Unemployed and not looking for work  
\_\_\_\_\_ Retired \_\_\_\_\_ Homemaker  
\_\_\_\_\_ Disabled \_\_\_\_\_ Full-time student
6. What is your occupation? [PLEASE NOTE: If you are currently not employed, retired, disabled or a homemaker, please describe your most recent prior employment. If you have never worked, write "N/A".]
  - a. What is your occupation (or what was it, if not currently employed)?  
\_\_\_\_\_
  - b. By whom are (were) you employed? \_\_\_\_\_
  - c. How long have (did) you work(ed) there? \_\_\_\_\_
  - d. Please describe the nature of your job. \_\_\_\_\_
  - e. Do (Did) you supervise other people? Yes \_\_\_\_ No \_\_\_\_ If so, how many? \_

7. During the course of your working life have you changed careers or occupations and, if so, what?

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8. Have you ever had a job which was considered management? Yes \_\_\_\_ No \_\_\_\_

a. If yes, how many people did you manage? \_\_\_\_\_

9. What is the highest level of education you have completed? \_\_\_\_\_

10. Please describe your educational background:

<u>School Name</u>	<u>Major areas of study</u>	<u>Degrees received</u>
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_____	_____	_____
_____	_____	_____
_____	_____	_____

11. Have you taken any courses in the law, legal procedure, or administration of justice, or learned about these subjects through other experiences? (If Yes, please describe):

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12. Have you taken any courses in business, finance, accounting, auditing, or bookkeeping or learned about these subjects through other experiences? (If Yes, please describe).

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13. Have you ever worked for an accounting firm or held a job that involved accounting, auditing, bookkeeping or finance, or working with accountants or auditors?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please describe, including naming which firms or companies, and your position or role:

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14. Have you ever held a job in sales, or a job that involved closely interacting with sales personnel?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please describe:

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15. Have you ever held a job in the technology sector, such as for a computer hardware or software company?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please describe:

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16. Have you ever held a job or had training that taught you anything about business acquisitions or mergers? Yes \_\_\_\_ No \_\_\_\_ If Yes, please describe:

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17. Please complete regarding your **present spouse or partner**. If you have no spouse/partner, leave blank.

Current employment status:

\_\_\_\_ Working full-time      \_\_\_\_ Unemployed  
\_\_\_\_ Working part-time      \_\_\_\_ Homemaker  
\_\_\_\_ Retired      \_\_\_\_ Full-time student  
\_\_\_\_ Disabled

- a. What is his/her occupation (or what was it, if retired or unemployed or disabled)?

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- b. By whom is (was) s/he employed? \_\_\_\_\_

How long has (did) s/he worked there? \_\_\_\_\_

- c. Please describe the nature of his/her job? \_\_\_\_\_

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- d. What other types of jobs has s/he had in the past?

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18. What is the highest level of education s/he completed? \_\_\_\_\_

Please describe her/his educational background, including vocational school(s) and/or college(s) attended:

<u>School Name</u>	<u>Major areas of study</u>	<u>Degrees received</u>
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_____
_____

19. What are/were your parents' and/or stepparents' occupations? (If retired or deceased, what did they do?)

Mother: \_\_\_\_\_ Father: \_\_\_\_\_

Stepmother: \_\_\_\_\_ Stepfather: \_\_\_\_\_

20. If you have children, please list and describe below:

<u>Sex</u>	<u>Age</u>	<u>Education</u>	<u>Occupation</u>
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_____
_____
_____
_____

21. If other adults live in your home in addition to those already you already described above, please state:

<u>Relationship</u>	<u>Sex</u>	<u>Age</u>	<u>Education</u>	<u>Occupation</u>
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_____
_____
_____

22. Have you, your current spouse/partner or your child ever served in the military?  
Yes \_\_\_\_ No \_\_\_\_

If yes, please list for: You Spouse, Partner or Child

Branch of service: \_\_\_\_\_

23. Please list your main sources of news – including which newspapers, magazines, television and radio stations or programs, internet sites, social media, and conversations with others:

_____
_____
_____

24. Do you watch, read, or listen to financial, investing, and/or corporate news ? If so, how often and from what source?

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25. If you are chosen as a juror, the Court will order you to limit what you learn about this case solely to the evidence presented during the trial. Will you have difficulty following that order?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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26. Have you previously served as a trial juror or as a grand juror? Yes \_\_\_\_ No \_\_\_\_  
If Yes, please complete for each case on which you served:

	Civil or Criminal	Nature of case (i.e., robbery or personal injury)	When/Where?	Verdict reached? (yes or no)
1				
2				
3				
4				
5				

- a. Have you ever served as a jury foreperson? Yes \_\_\_\_ No \_\_\_\_
- b. Is there any reason that your prior jury service would affect your ability to be fair, objective and impartial to both sides at trial? Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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27. Have you or any family member ever had occasion to contact the United States Attorney's Office or the District Attorney's Office, including the Family Support, Consumer Fraud or Victim/Witness Divisions?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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28. Have you or any close friends or family members ever been employed by or affiliated with any law enforcement agency (including police, sheriff, corrections, FBI, Immigration, IRS, SEC, parole or probation, etc.)? Yes \_\_\_\_ No \_\_\_\_  
If Yes, please list:

<u>Name</u>	<u>Relationship to you</u>	<u>Position</u>	<u>Agency</u>
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29. Have you, or a close friend or family member, ever worked for a court, a prosecutor's office, or a criminal defense office? This includes a judge, a District Attorney's office, a United States Attorney's office, or any private or public criminal defense attorney's office.

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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30. Have you or has anyone close to you ever been the victim of any kind of crime – including domestic violence, burglary, robbery, assault, identity theft, etc. – whether it was reported to law enforcement authorities or not?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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31. Have you, or any member of your family or any close friends, ever been arrested?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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32. Have you, or any member of your family or close friends, ever been accused of fraud or misrepresentations, or of fraudulently concealing information?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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33. Have you, any member of your family or close friends, ever accused someone else (including a company) of fraudulent behavior?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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34. Have you, or a close friend or family member, ever had a positive or negative experience with a law enforcement officer or agency, federal agency, or the federal government which would influence your ability to judge the facts of a criminal case or the person accused?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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35. Have you, or a close friend or family member, ever suffered a substantial monetary loss as a result of a financial investment, including stocks, real estate, business, or cryptocurrency?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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36. Have you, or a company you worked for, been harmed by the wrongdoing of another party in a business dealing?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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37. Is there anything about your experiences, opinions, or beliefs about race, color, immigration status, national origin, or ethnicity, which would influence your ability to judge the facts of a criminal case or the person accused?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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38. Is there anything about your personal beliefs, whether religious, moral, ethical, or philosophical, that would influence, inhibit or hinder your ability to judge the facts in a criminal case?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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39. In a criminal prosecution the government has the burden of proving guilt beyond a reasonable doubt. The defendant is presumed innocent and therefore has no burden to present any evidence. Given the above principles of law, do you agree or disagree with the following statements: (Answer each.)

- a. A defendant in a criminal trial should be required to prove his or her innocence.

Yes \_\_\_\_ No \_\_\_\_

If Yes, please describe:

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- b. I would expect people charged with crimes to testify in their own defense.

Yes \_\_\_\_ No \_\_\_\_

If Yes, please describe:

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40. The Court will instruct you on the laws and your duties as jurors. Will you be able to follow these instructions even if you disagree with them or they conflict with your conscience or moral beliefs?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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41. The cover page contains a brief statement about this case. Have you heard or read anything about this case before today?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
42. Is there anything about the nature of the charges and/or what you have heard or read about this case that could affect how you judge the facts of this case or the person accused?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
43. Have you, or someone close to you, had any prior professional or personal dealings with Autonomy, Hewlett-Packard, Invoke Capital, or Darktrace, or strong opinions about any of these companies, that would influence your ability to be a fair and impartial juror in this case?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
44. Have you ever owned any stock in, or had a financial interest in, Hewlett-Packard or Autonomy? Yes \_\_\_\_ No \_\_\_\_
45. Do you consider yourself to be highly skilled in software technology?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
46. Do you consider yourself to be highly skilled in accounting?  
Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
47. Do you know or are you familiar with any of the attorneys or potential witnesses in this case, which are listed on Attachment A.  
  
Yes \_\_\_\_ No \_\_\_\_

48. The Court estimates that the trial in this case will last approximately ten weeks. Trial days during the week will be from Monday to Thursday and from 9:00 a.m. to approximately 4:00 p.m. Do you have any specific problems of a serious nature that might prevent you from serving as a juror in this case? For example, these may include any prepaid vacation plans, childcare or elder care responsibilities, severe financial hardship, or important medical appointments that cannot be rescheduled?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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49. Do you have any medical, mental or physical conditions (including any caused by medications, or concerns about Covid-19) that would make it difficult for you to sit as a juror or might interfere with your ability to concentrate, understand, and consider all of the evidence presented at trial?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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50. Is there any other information you feel the judge or attorneys should know about you, including any reason why either side (the government or the defense) may not want you to serve as a juror in this case?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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51. Is there any matter that you would prefer to discuss privately with the Court?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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### **JUROR'S OATH**

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, nor received assistance in completing this questionnaire.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

## Further Explanation Sheet

**(Please put the question number next to your response. Thank you)**

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.